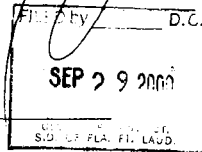


United States District Court



SOUTHERN

DISTRICT OF

FLORIDA

UNITED STATES OF AMERICA

v.

DONNA A. JACKSON

CRIMINAL COMPLAINT

CASE NUMBER:

00-4229-BSS

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 27, 2000, in Broward county, in the Southern District of Florida defendant(s) did, (Track Statutory Language of Offense)

knowingly and intentionally import cocaine into the United States from a place outside thereof

in violation of Title 21 United States Code, Section(s) 952

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

Please see attached affidavit.

Continued on the attached and made a part hereof:

☒ Yes ☐ No

Signature of Complainant
Jeffrey Outlaw, Special Agent
United States Customs Service

Sworn to before me, and subscribed in my presence,

September 29, 2000

Date

at Ft. Lauderdale, Florida
City and State

BARRY S. SELTZER
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT

I, Jeffrey S. Outlaw, being first duly sworn, do hereby depose and state as follows:

1. I am a Special Agent with the United States Customs Service, (hereafter "USCS") and have been so employed for approximately seven (7) years. My duties as a Special Agent include the investigation of narcotics related offenses.

2. The facts contained in this affidavit are based on my own personal knowledge, as well as observations and facts related to me by agents of the United States Customs Service and civilian personnel involved in this investigation.

3. On September 27, 2000, at approximately 11:00 p.m., DONNA A. JACKSON, arrived at Fort Lauderdale-Hollywood International Airport, in Fort Lauderdale, Florida, in the Southern District of Florida, from Jamaica aboard Air Jamaica Flight 89.


4. JACKSON, who was traveling alone, presented herself and her luggage for examination to the United States Customs Service. JACKSON was then referred to secondary examination where she provided inconsistent statements concerning prior travel to the United States. Because of these statements and her nervous demeanor, JACKSON was asked for consent to an x-ray examination of her person. JACKSON consented in writing.

5. JACKSON was transported to Broward General Hospital where the x-ray revealed foreign objects in her abdominal area.

As a result, JACKSON underwent monitored bowel movements during which she expelled a pellet wrapped in latex. The pellet was probed and produced a white powdery substance which field tested positive for the presence of cocaine. Between September 27, 2000 and September 29, 2000, JACKSON expelled 108 pellets all of which contained a white powdery substance believed to be cocaine with a combined gross weight of 2.35 pounds. *Jackson was placed under arrest at approximately 6:00pm on September 29, 2000.*

WHEREFORE, your affiant believes there is probable cause to assert that DONNA A. JACKSON did knowingly and intentionally import into the United States from a place outside thereof, in violation of Title 21, United States Code Section 952.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


JEFFREY S. OUTLAW
SPECIAL AGENT
UNITED STATES CUSTOMS SERVICE

Sworn and subscribed to me
this 29th day of September, 2000.


BARRY S. SELTZER
UNITED STATES MAGISTRATE JUDGE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

BOND RECOMMENDATION

DONNA A. JACKSON

DEFENDANT

PRETRIAL DETENTION (Surety, Recognizance, Corp. Surety, Cash)
(Jail) (On Bond) (Warrant) (Summons)
(Marshal's Custody)



KATHLEEN RICE
ASSISTANT UNITED STATES ATTORNEY
Fla Bar No. 100765

Last Known Address:

What Facility:

Agent(s):

JEFF OUTLAW, USCS

(FBI) (SECRET SERVICE) (DEA) (CUSTOMS) (ATF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. _____

UNITED STATES OF AMERICA

vs.

DONNA A. JACKSON,

Defendant


CRIMINAL COMPLAINT COVER SHEET

1. Did this case originate from a matter pending in the United States Attorney's Office prior to April 1, 1999? ____ Yes X No
2. Did this case originate from a matter pending in the Central Region of the United States Attorney's Office prior to April 1, 1999? ____ Yes X No
3. Has AUSA Richard Scruggs had supervisory authority over, or otherwise participated in, this case?
____ Yes X No

Respectfully submitted,

GUY A. LEWIS
UNITED STATES ATTORNEY

BY:


KATHLEEN RICE
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